

UNITED STATES DISTRICT COURT

for the

Western District of Virginia

Kevin Klik)
)
)
 v.) Case No.: 6:15-cv-00002
 Verizon Virginia Inc., et al.)
)
)

BILL OF COSTS

Judgment having been entered in the above entitled action on 03/08/2016 Date against Plaintiff Kevin Klik, the Clerk is requested to tax the following as costs:

Fees of the Clerk	\$ <u>0.00</u>
Fees for service of summons and subpoena	<u>0.00</u>
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	<u>2,783.70</u>
Fees and disbursements for printing	<u>0.00</u>
Fees for witnesses (<i>itemize on page two</i>)	<u>116.68</u>
Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case	<u>142.01</u>
Docket fees under 28 U.S.C. 1923	<u>0.00</u>
Costs as shown on Mandate of Court of Appeals	<u>0.00</u>
Compensation of court-appointed experts	<u>0.00</u>
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	<u>0.00</u>
Other costs (<i>please itemize</i>)	<u>0.00</u>
TOTAL	\$ <u>3,042.39</u>

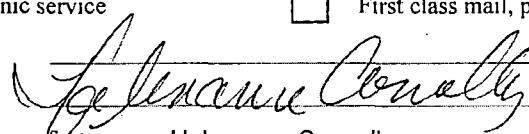
SPECIAL NOTE: Attach to your bill an itemization and documentation for requested costs in all categories.

Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:

Electronic service First class mail, postage prepaid
 Other:

s/ Attorney:



Name of Attorney: Helenanne Connolly

For: Verizon Virginia Inc.
Name of Claiming Party

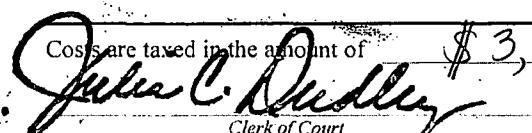
Date: 3/29/14

Taxation of Costs

Costs are taxed in the amount of

\$ 3,042.39

and included in the judgment.


Clerk of Court

By: Fay Coleman
Deputy Clerk

4/13/2016
Date

UNITED STATES DISTRICT COURT

NOTICE

Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:
“Sec. 1924. Verification of bill of costs.”

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

See also Section 1920 of Title 28, which reads in part as follows:

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

The Federal Rules of Civil Procedure contain the following provisions:

RULE 54(d)(1)

Costs Other than Attorneys' Fees.

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

RULE 6

(d) Additional Time After Certain Kinds of Service.

When a party may or must act within a specified time after service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

RULE 58(e)

Cost or Fee Awards:

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA

KEVIN C. KLIK,)
Plaintiff,)
v.)
VERIZON VIRGINIA INC.,) Civil Action No. 6:15-cv-00002
et al.,)
Defendants.)

**VERIZON VIRGINIA INC.'S ITEMIZATION
OF ALL FEES AND COSTS SET FORTH IN ITS BILL OF COSTS**

**1) "FEES FOR PRINTED OR ELECTRONICALLY RECORDED TRANSCRIPTS NECESSARILY
OBTAINED FOR USE IN THE CASE" (COURT REPORTER COSTS FOR TRANSCRIPTS OF THE
FOLLOWING DEPOSITIONS):¹**

a)	<i>Central Virginia Reporters</i>	\$ 809.75 ²
	Transcripts of depositions of Michael E. Smyth, Michael R. Reynolds, and Jason L. Price.	
b)	<i>Central Virginia Reporters</i>	\$ 636.55 ³
	Transcripts of depositions of Anne Oommen and Catherine Walsh.	
c)	<i>DTI</i> ⁴	\$ 454.80
	Transcript of deposition of Christopher John, M.D.	
d)	<i>DTI</i>	\$ 882.60

¹ The following invoices are attached hereto as Exhibits 1A through 1D.

² The applicable invoice is addressed to Verizon Virginia, Inc.'s ("Verizon") counsel and will be billed to Verizon in next month's billing cycle.

³ The applicable invoice is addressed to Verizon's counsel and will be billed to Verizon in next month's billing cycle.

⁴ DTI's invoices were sent directly to and paid by Verizon.

Transcript of deposition of **Kevin Klik**.

TOTAL TRANSCRIPT COSTS: \$ 2,783.70

2) "FEES FOR EXEMPLIFICATION AND THE COSTS OF MAKING COPIES OF ANY MATERIALS WHERE THE COPIES ARE NECESSARILY OBTAINED FOR USE IN THE CASE" (COPYING COSTS FOR OBTAINING PLAINTIFF'S MEDICAL RECORDS):⁵

a) *Centra Medical Group* \$ 40.00

Copying charges from third party custodian
Village Family Physicians.

b) *HealthPort* \$ 102.01

Copying charges from third party custodian
Carilion Clinic Orthopaedics.

TOTAL COPY COSTS: \$ 142.01

3) "FEES AND DISBURSEMENTS FOR PRINTING AND WITNESSES" (WITNESS FEES):⁶

a) Witness fee for **Dr. Christopher John.** \$ 40.00⁷

b) Mileage for **Catherine Walsh.** \$ 76.68⁸

TOTAL WITNESS COSTS: \$ 116.68

TOTAL COSTS: **\$ 3,042.39**

⁵ The following invoices – both of which were billed to Verizon – are attached hereto as **Exhibits 2A and 2B.**

⁶ The following support for these costs are attached hereto as **Exhibits 3A and 3B.**

⁷ The witness fee paid to Dr. John will be billed to Verizon in next month's billing cycle.

⁸ With respect to costs incurred by Verizon relating to the deposition of Catherine Walsh, Verizon covered the cost of Ms. Walsh's mileage (*i.e.*, 142 miles round trip at the applicable IRS rate of \$.54 per mile). *See Exhibit 3B.*

Respectfully submitted,

VERIZON VIRGINIA INC.
By Counsel

s/ Helenanne Connolly
Betty S.W. Graumlich
Virginia Bar No. 30825
Attorney for Verizon Virginia Inc.
REED SMITH LLP
Riverfront Plaza – West Tower
901 E. Byrd Street, Suite 1700
Richmond, Virginia 23219
Telephone: (804) 344-3400
Facsimile: (804) 344-3410
bgraumlich@reedsmit.com

Helenanne Connolly
Virginia Bar No. 70911
Attorney for Verizon Virginia Inc.
REED SMITH LLP
3110 Fairview Park Drive, Suite 1400
Falls Church, Virginia 22042
Telephone: (703) 641-4504
Facsimile: (703) 641-4340
hconnolly@reedsmit.com

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March, 2016, a true and correct copy of the foregoing was filed with the Court's CM/ECF Filing System with electronic notice sent to the following:

Melvin E. Williams, Esq.
Virginia Bar No. 43305
Attorney for Kevin C. Klik
MEL WILLIAMS PLC
1320 Third Street, SW
Roanoke, Virginia 24016
(540) 266-7800 (Telephone)
(540) 206-3857 (Facsimile)
mel@melwilliamslaw.com

s/ Helenanne Connolly
Betty S.W. Graumlich
Virginia Bar No. 30825
Attorney for Verizon Virginia Inc.
REED SMITH LLP
Riverfront Plaza – West Tower
901 E. Byrd Street, Suite 1700
Richmond, Virginia 23219
(804) 344-3400 (Telephone)
(804) 344-3410 (Facsimile)
bgraumlich@reedsmit.com

Helenanne Connolly
Virginia Bar No. 70911
Attorney for Verizon Virginia Inc.
REED SMITH LLP
3110 Fairview Park Drive, Suite 1400
Falls Church, Virginia 22042
(703) 641-4504 (Telephone)
(703) 641-4340 (Facsimile)
hconnolly@reedsmit.com



(540) 380-5017

www.centralvarep.com

Helenanne Connolly, Esq.
ReedSmith LLP
3110 Fairview Park Drive, Suite 1400
Falls Church, VA 22042

INVOICE

Invoice No.	Invoice Date	Job No.		
130726	1/25/2016	111659		
Job Date	Case No.			
1/12/2016	6:15 CV 00002 NKM			
Case Name				
Kevin C. Klik vs. Verizon Virginia Inc., et al.				
Payment Terms				
Due upon receipt				

1 COPY OF TRANSCRIPT OF: Michael E. Smyth	427.50
1 COPY OF TRANSCRIPT OF: Michael R. Reynolds	256.25
1 COPY OF TRANSCRIPT OF: Jason L. Price	126.00
	TOTAL DUE >>>
	\$809.75

Thank you for choosing Huseby!

Schedule with us anywhere nationally today!

To learn more about the services and technology we provide for both depositions and trial, visit us online at www.huseby.com.

Tax ID: 31-1763752

Phone: 703-641-4504 Fax: 703-641-4340

Please detach bottom portion and return with payment.

Helenanne Connolly, Esq.
ReedSmith LLP
3110 Fairview Park Drive, Suite 1400
Falls Church, VA 22042

Job No. : 111659 BU ID :CVR
Case No. : 6:15 CV 00002 NKM
Case Name : Kevin C. Klik vs. Verizon Virginia Inc., et al.

Invoice No. : 130726 Invoice Date : 1/25/2016
Total Due : \$ 809.75

PAYMENT WITH CREDIT CARD



A 3% fee will be added to the 'Amount to Charge' to offset our processing costs
Cardholder's Name:

Card Number:

Exp. Date: Phone#:

Billing Address:

Zip: Card Security Code:

Amount to Charge:

Cardholder's Signature:

Remit To: **Huseby, Inc.**
P.O. Box 602928
Charlotte, NC 28260-2928

Exhibit 1A



(540) 380-5017

www.centralvarep.com

Betty S. W. Graumlich, Esq.
Reed Smith, LLP
Riverfront Plaza - West Tower
901 East Byrd Street, Suite 1700
Richmond, VA 23219

ReedSmith

FEB X 8 2016

Received

INVOICE

Invoice No.	Invoice Date	Job No.
131094	1/31/2016	111131
Job Date	Case No.	
1/20/2016	6:15 CV 00002 NKM	
Case Name		
Kevin C. Klik vs. Verizon Virginia Inc., et al.		
Payment Terms		
Due upon receipt		

1 COPY OF TRANSCRIPT OF:

Anne Oommen

340.05

1 COPY OF TRANSCRIPT OF:

Catherine Walsh

296.50

TOTAL DUE >>>

\$636.55

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Tax ID: 31-1763752

Phone: 804-344-3400 Fax: 804-344-3410

Please detach bottom portion and return with payment.

Job No. : 111131 BU ID :CVR

Case No. : 6:15 CV 00002 NKM

Case Name : Kevin C. Klik vs. Verizon Virginia Inc., et al.

Invoice No. : 131094 Invoice Date : 1/31/2016

Total Due : \$ 636.55

PAYMENT WITH CREDIT CARD

A 3% fee will be added to the 'Amount to Charge' to offset our processing costs
Cardholder's Name:

Card Number:

Exp. Date: Phone:

Billing Address:

Zip: Card Security Code:

Amount to Charge:

Cardholder's Signature:

Remit To: Huseby, Inc.
P.O. Box 602928
Charlotte, NC 28260-2928

Exhibit 1B



INVOICE

Phone: 800-292-4789

Verizon Wireless, Inc.
1 Verizon Way
Basking Ridge, NJ 07920-1097

Invoice #: M-046560
Invoice Date: 02/08/16
Our Order #: WDC-067587-01
Customer #: 101792

Attn: MARY HUNE

Terms: Due upon receipt

Case No: 6:15-CV-00002 NKM

CLIENT REFERENCE 29854

Klik vs. Verizon Virginia, Inc.
a/k/a Verizon VA, et al

Job Date: 01/06/16

Deponent: Christopher John, M.D.

Exhibit Scanning - OCR-PDF-Pg-STD	335	PAGE	\$0.40	\$134.00
Exhibit Linking - Per Transcript - LEF-Ea-STD	1	PAGE	\$25.00	\$25.00
Deposition Transcript - Original-Pg-STD	87	PAGE	\$3.40	\$295.80
			Subtotal:	\$454.80
			Sales Tax	\$0.00
			Total Invoice USD	\$454.80

Depo Location: 4064 Postal Drive, S.W.
Roanoke, VA 24018

Sold To:
Graumlich, Betty S.
Reed Smith LLP
901 East Byrd Street
Suite 1700
Richmond, VA 23219-4068

Thank You. Your Business is appreciated.

Exhibit 1C

REMIT TO:

DTI
PO Box 936158
Atlanta, GA 31193-6158

PLEASE PAY FROM THIS INVOICE

ABA Routing #: 121000248
Beneficiary Account #: 4125126904
Beneficiary Name: DTI

For credit card payments, please visit

<https://www.e-billexpress.com/ebpp/DTI>

Tax No: 58-2413793



INVOICE

Phone: 800-292-4789

Verizon Wireless Inc
1 Verizon Way
Basking Ridge, NJ 07920-1097

Invoice #: M-040172
Invoice Date: 12/31/15
Our Order #: WDC-061796-01
Customer #: 101792

Attn: MARY HUNE

Terms: Due upon receipt

Case No: 6:15-CV-00002 NKM

CLIENT REFERENCE 29854

Klik vs. Verizon Virginia, Inc. a/k/a
Verizon VA, et al

Job Date: 11/18/15

Deponent: Kevin C. Klik

Exhibit Scanning - OCR-PDF-Pg-STD	189	PAGE	\$0.40	\$75.60
Exhibit Linking - Per Transcript - LEF-Ea-STD	1	EACH	\$25.00	\$25.00
Deposition Transcript - Original-Pg-STD	230	PAGE	\$3.40	\$782.00
			Subtotal:	\$882.60
			Sales Tax	\$0.00
			Total Invoice USD	\$882.60

Depo Location: 10 Franklin Road S.E.
Suite 900
Roanoke, VA 24011

Sold To: Graumlich, Betty S.
Reed Smith LLP
901 East Byrd Street
Suite 1700
Richmond, VA 23219-4068

Thank You. Your Business is appreciated.

Exhibit 1D

REMIT TO:
DTI
PO Box 936158
Atlanta, GA 31193-6158

PLEASE PAY FROM THIS INVOICE
ABA Routing #: 121000248
Beneficiary Account #: 4125126904
Beneficiary Name: DTI

For credit card payments, please visit

<https://www.e-billexpress.com/ebpp/DTI>

Tax No: 58-2413793



Village Family Physicians
4830 Rucker Road
Moneta, VA 24121
Phone: (540) 297-7181 Fax: (540) 297-0051.

ReedSmith
NOV 16 2015

Received

Invoice for Copying Records

Date: 11-16-15

Record Copied (patient name): Karen Kilk 12-13-56

Search and Handling Charge: \$10.00

Per page copy \$0.50 x 50 = \$25 (for first 50 pages)

Per page copy \$0.25 x 20 = \$5.00 (51 + pages)

Total Cost: \$30

Payment: _____

VFP TAX ID
2036 393 29

Received by: _____

Please include a copy of this invoice with your payment.

** Your records will be sent when payment of this invoice is received.

Exhibit 2A

Excerpt of Cost Detail (Klik 067090.50698)

Cost Type	Work Date	Narrative	Invoice		Work Qty	Work Rate	Work Amt	Unbilled Amt	Billed Amount
			Number	Tkpr Name					
Medical Records	11/18/2015	MEDICAL RECORDS Medical Records - VENDOR: Centra Medical Group, 4830 Rucker Road, Moneta, VA 24121	2767523	Graumlich Betty	1	40.00	40.00	-	40.00

HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

 HealthPort
INVOICE

Invoice #: 0177983534
Date: 10/13/2015
Customer #: 1937666

Ship to:

BETTY S W GRAUMLICH
REED SMITH LLP
RIVERFRONT PLAZA
901 E BYRD ST
STE 1700
RICHMOND, VA 23219-4068

Bill to:

BETTY S W GRAUMLICH
REED SMITH LLP
RIVERFRONT PLAZA
901 E BYRD ST
STE 1700
RICHMOND, VA 23219-4068

Records from:

CARILION CLINIC ORTHOPAEDICS
4064 POSTAL DR
ROANOKE, VA 24018-6438

Requested By: REED SMITH LLP
Patient Name: KIRK KEVIN

DOB: 121356

ReedSmith

Description	OCT 21 2015	Quantity	Unit Price	Amount
Basic Fee				10.00
Retrieval Fee				0.00
Per Page Copy (Paper) 1				58.25
Per Page Copy (Paper) 2				25.00
Shipping		233	0.25	8.76
Subtotal		50	0.50	102.01
Sales Tax				0.00
Invoice Total				102.01
Balance Due				102.01

Pay your invoice online at www.HealthPortPay.com

Terms: Net 30 days

Please remit this amount : \$ 102.01 (USD)

.....
HealthPort
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
(770) 754 - 6000

Invoice #: 0177983534

Check # _____

Payment Amount \$ _____

Please return stub with payment.

Please include invoice number on check.

To pay invoice online, please go to www.HealthPortPay.com or call (770) 754-6000.
Email questions to Collections@healthport.com.

Exhibit 2B

Excerpt of Cost Detail (Klik 067090.50698)

Cost Type	Work Date	Narrative	Invoice Number	Tkpr Name	Work Qty	Work Rate	Work Amt	Unbilled Amt	Billed Amount
Medical Records	10/13/2015	MEDICAL RECORDS Medical Records - VENDOR: HEALTHPORT: Carillon Clinic Orthopaedics	2752573	Graumlich Betty	1	102.01	102.01		102.01

CAPITOL PROCESS SERVICES, INC.

1827 18th Street, NW, Washington, DC 20009

Phone 202 667-0050 -- FAX 202 667-2520

tfelter@capitolprocess.com

Helenanne Connolly, Esquire
Reed Smith LLP
3110 Fairview Park Drive, Suite 1400
Falls Church, Virginia 22042

Due By: 01/15/2016
Invoice Date: 12/16/2015
Invoice #: 1502474
Job#: 1502474
Client File#: N/A

TOTAL INVOICE AMOUNT DUE
\$250.00

Job #: 1502474 Client File # N/A
Plaintiff: Kevin C. Klik
Defendant: Verizon Virginia, Inc, et al.
Case Number 6:15-cv-00002-NJM

Recipient:
Christopher John M.D.
Carilion Clinic Orthopaedics, 4064 Postal Drive,

Date Received:
12/9/2015
Completed:
12/9/2015

Description	Qty	Fee	Total Fee
Check Issue Fee	1	\$10.00	\$10.00
*Witness Fee Tendered	1	\$40.00	\$40.00
Service of Process	1	\$150.00	\$150.00
Priority Fee - RUSH	1	\$50.00	\$50.00

Job Total Due = \$250.00

Job Total Recd =

TOTAL INVOICE CHARGES: \$250.00

TOTAL INVOICE PAYMENTS:

TOTAL INVOICE AMOUNT DUE: \$250.00



Terms: THANK YOU FOR YOUR BUSINESS !

Exhibit 3A

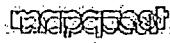
YOUR TRIP TO:

136 Main St, Princeton, NJ 08540-5731

1 HR 15 MIN | 71.0 MI 

Trip time based on traffic conditions as of 2:07 PM on March 23, 2016. Current Traffic: Light

From: 408 Vineyard Lane, Downingtown, PA 19335



1. Start out going southwest on Vineyard Ln.
Then 0.04 miles 0.04 total miles
2. Turn left to stay on Vineyard Ln.
Then 0.14 miles 0.18 total miles
3. Turn left onto Wharton Blvd.
If you are on E Vineyard Ln and reach Ferncastle Dr you've gone about 0.1 miles too far.
Then 0.21 miles 0.39 total miles
4. Take the 1st right onto Wellington Sq.
If you reach Gramercy Ln you've gone a little too far.
Then 0.27 miles 0.67 total miles
5. Take the 1st right onto Rice Blvd.
Rice Blvd is 0.1 miles past Cricket Ln.
If you are on Stockton Dr and reach Township Line Rd you've gone about 0.2 miles too far.
Then 0.17 miles 0.84 total miles
6. Turn right onto Pennsylvania Dr.
YMCA At Eagleview is on the right.
Then 0.32 miles 1.15 total miles
7. Turn left onto Eagleview Blvd.
Then 0.22 miles 1.38 total miles
8. Turn right onto N Pottstown Pike/PA-100;
N Pottstown Pike is just past Constitution Dr.
Then 0.37 miles 1.74 total miles
9. Merge onto I-76 E/Pennsylvania Tpke E toward I-476/Northeast Extension/Philadelphia/New Jersey (Portions toll).
Then 14.70 miles 16.44 total miles
10. Stay straight to go onto I-276 E/Pennsylvania Tpke E (Portions toll).
Then 24.98 miles 41.42 total miles
11. Take the US-1 exit, EXIT 351, toward Philadelphia/Trenton.
Then 0.82 miles 42.03 total miles
12. Merge onto US-1 N via the ramp on the left toward Morrisville (Crossing into New Jersey).
Then 27.29 miles 69.29 total miles
13. Turn slight right.
Then 0.07 miles 69.36 total miles
14. Turn sharp left onto Ridge Rd.
If you are on Ridge Rd and reach Schalks Crossing Rd you've gone about 0.2 miles too far.
Then 0.89 miles 70.34 total miles
15. Ridge Rd becomes Heathcote Rd
Then 0.31 miles 70.65 total miles

Exhibit 3B

408 Vineyard Ln, Downingtown, PA 19335 to 136 Main St, Princeton, NJ 08540-5731 Directions - MapQuest... Page 2 of 2

16. Turn left onto NJ-27/Route 27.
NJ-27 is 0.1 miles past Euclid Ave.

If you are on Laurel Ave and reach Union St you've gone about 0.1 miles too far.

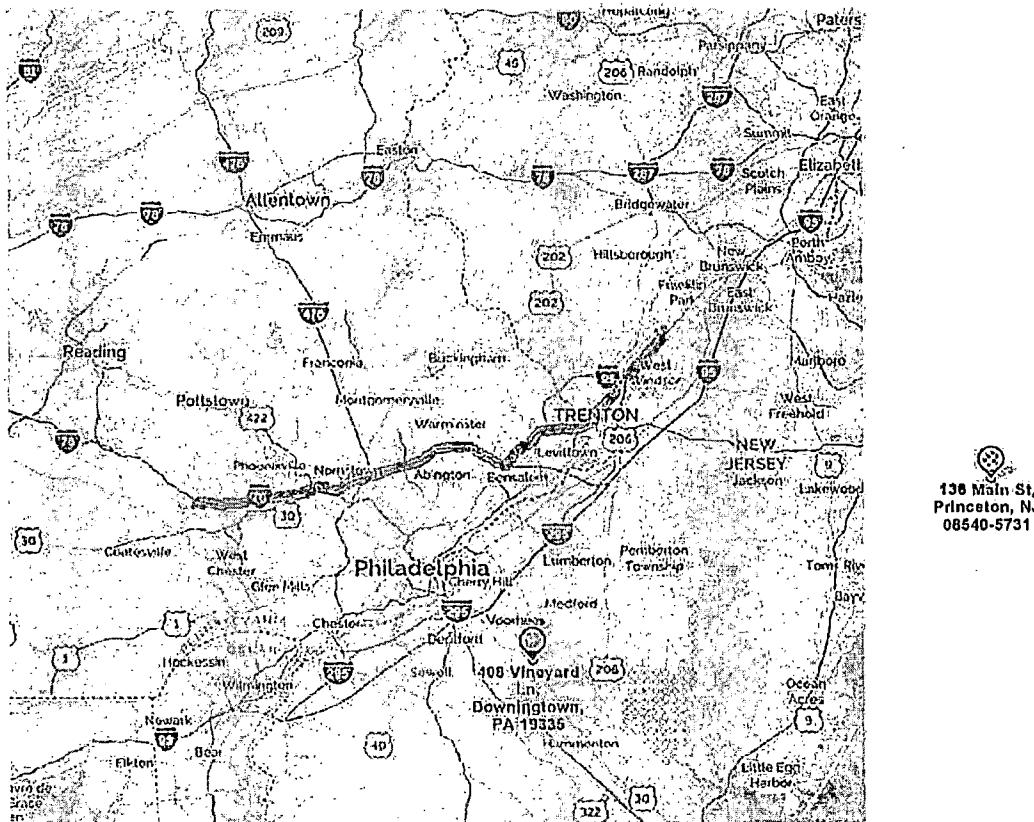
Then 0.32 miles;

70.97 total miles

17. 136 MAIN ST.

If you are on Princeton Kingston Rd and reach River Rd you've gone about 0.1 miles too far.

Use of directions and maps is subject to our [Terms of Use](#). We don't guarantee accuracy, route conditions or usability. You assume all risk of use.



**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA**

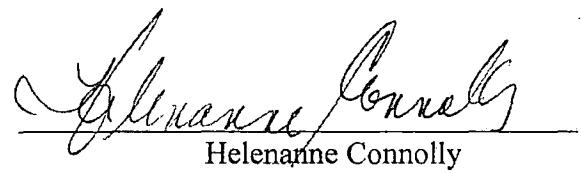
KEVIN C. KLIK,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 6:15-cv-00002
VERIZON VIRGINIA INC.,)	
<i>et al.,</i>)	
)	
Defendants.)	

**DECLARATION OF HELENANNE CONNOLLY IN SUPPORT OF DEFENDANT
VERIZON VIRGINIA INC.'S BILL OF COSTS**

I, Helenanne Connolly, declare as follows:

1. I am an attorney admitted to practice law in the Commonwealth of Virginia with the firm of Reed Smith LLP, attorneys for Defendant, Verizon Virginia Inc. ("Verizon") and as such, have knowledge of the matters set forth herein, and if called as a witness, could and would competently testify to them.
2. This declaration is submitted in support of Verizon's request for taxation of costs pursuant to 28 U.S.C. §§ 1920 and 1924. Each of the costs set forth were necessarily incurred in this action and are permitted under Federal Rule of Civil Procedure 54(d).
3. Verizon's Bill of Costs seeks \$3,042.39 in costs. Each of the costs set forth is correct and was necessarily incurred in this action and the services for which fees have been charged were actually and necessarily performed. An itemization of the costs is attached to the Bill of Costs, followed by true and correct copies of supporting invoices and accounting records, attached as Exhibits 1A through 3B.

I declare under penalty of perjury that the foregoing is true and correct.



Helenarne Connolly

March 29, 2016